IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

:

UNITED STATES OF AMERICA

: Case No. 21-CR-00427

V.

:

JOSEPH A. CAMMARATA,

:

Defendant.

:

DEFENDANT JOSEPH CAMMARATA'S RESPONSE TO THE GOVERNMENT'S STATUS REPORT

Defendant Joseph A. Cammarata ("Mr. Cammarata"), by and through undersigned counsel, hereby respectfully submits his Response to the Government's Status Report.

In addition to the information outlined in the Government's Status Report, a representative from Communitel sent an e-mail to the Government describing the "normal exchange with a customer". The e-mail is attached hereto as <a href="Exhibit "A". This e-mail is relevant because it shows that, under normal circumstances, the passport would have been returned to Mr. Cammarata upon completing the registration process. Notably, Mr. Cammarata was in FBI custody during this process.

Furthermore, Mr. Cammarata herewith submits two invoices relating to the Government's contention that Mr. Cammarata allegedly assisted his girlfriend, Jessica Vanessa Carrillo Beltrán ("Ms. Carrillo"), in travelling to the United States in June of 2021. *See Exhibit* "B" and "C". These invoices reflect that Mr. Cammarata travelled to the United States alone, and that Ms. Carrillo remained in The Bahamas.

Dated: March 9, 2022 Respectfully Submitted,

/s/ Dennis E. Boyle

Dennis E. Boyle, Esquire (#49618)

Blerina Jasari, Esquire (*Pro Hac Vice* Forthcoming) Boyle & Jasari 1050 Connecticut Ave, Suite 500 Washington, D.C., 20036 Email: dboyle@dennisboylelegal.com

Phone: (202) 798-7600

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response to Government's Status Report has been served on counsel of record for all parties via the Court's CM/ECF system.

Dated: March 9, 2022 /s/ Dennis E. Boyle

Dennis E. Boyle, Esquire